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State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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December 10, 2002

James T. Jensen, Vice President
Savage Industries, Inc.
6340 South 3000 East, Suite 600
Salt Lake City, Utah 84121

Re: Conditional Approval of Amendment to Water Monitoring Plan, Savage Industries, Inc.,
Savage Coal Terminal, C/007/022-AM02E, Outgoing File

Dear Mr. Jensen:

The above-referenced amendment is conditionally approved upon receipt of three clean copies prepared for incorporation. Please submit these copies by January 9, 2002. Once we receive these copies, final approval will be granted, at which time you may proceed with your plans.

A stamped incorporated copy of the approved plans will also be returned to you at that time, for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed.

If you have any questions, please call me at (801) 538-5325 or Gregg Galecki at (801) 538-5260.

Sincerely,

Daron Haddock
Permit Supervisor

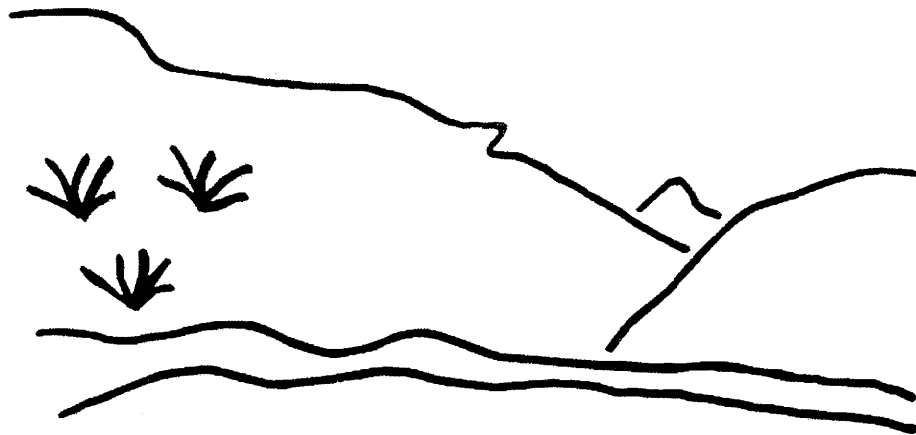
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Enclosure

cc: Price Field Office

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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

Savage Coal Terminal
Water Monitoring Plan
C/007/022-AM02E
Technical Analysis
December 9, 2002

TECHNICAL ANALYSIS

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The Division ensures compliance with the Surface Mining Control and Reclamation Act of 1977 (SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

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TECHNICAL ANALYSIS

INTRODUCTION

INTRODUCTION

On November 14, 2002, the Division received a proposed amendment to the Savage Coal Terminal Water Monitoring Program. The proposal was submitted to abate a potential violation for not conducting the typical bi-annual water monitoring at the Savage Coal Terminal. The function of the changes to the water monitoring plan is to eliminate any possibility of confusion of what is expected with a 'bi-annual' sampling frequency. The following technical review evaluates the proposed amendment from a hydrologic prospective only. The amendment meets the minimum requirements of the State regulation.

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INTRODUCTION

OPERATION PLAN

OPERATION PLAN

HYDROLOGIC INFORMATION

Regulatory Reference: 30 CFR Sec. 773.17, 774.13, 784.14, 784.16, 784.29, 817.41, 817.42, 817.43, 817.45, 817.49, 817.56, 817.57; R645-300-140, -300-141, -300-142, -300-143, -300-144, -300-145, -300-146, -300-147, -300-148, -301-512, -301-514, -301-521, -301-531, -301-532, -301-533, -301-536, 301-542, -301-720, -301-731, -301-732, -301-733, -301-742, -301-743, -301-750, -301-761, -301-764.

Analysis:

Groundwater monitoring

A review of the water monitoring history for site CV-1W since 1988 indicates the 'bi-annual sampling was conducted both in the 2nd and 4th quarters with only two exceptions. It wasn't sampled in 1999 (no explanation), and the 2nd quarter of 2002. To avoid any confusion and misinterpretation of the monitoring plan on the Operator's part, the Division requested a modification to the water-monitoring plan. The modification clearly indicates sampling will be conducted in the 2nd and 4th quarters in text on pages 7-56, 7-91, and 7-93. No additional modifications are necessary at this time.

Findings:

Information in the application adequately addresses the requirements of the Operation Plan - Hydrologic Information section of the Regulations.